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By ECF

March 4, 2021

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, N.Y. 10007

Re: ***Fernandez-Rodriguez et al. v. Licon-Vitale***, No. 20 Civ. 3315 (ER)

Dear Judge Ramos:

The parties in the above-captioned action write jointly to request that the Court extend the deadline to file a joint letter regarding the need for further discovery in this litigation from March 5, 2021, to March 19, 2021.

Respondent completed production of email documents for all custodians on March 2, 2021. The parties are now engaged in productive meet and confer discussions regarding additional discovery necessary for this litigation. The parties endeavor to reach a compromise on additional discovery requests and a proposed discovery schedule, and seek a two-week extension in order to continue their discussions.

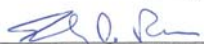
Respectfully submitted,

s/ Arlo Devlin-Brown

Arlo Devlin-Brown
Andrew A. Ruffino
Alan Vinegrad
Timothy C. Sprague

CC: Counsel for Respondent by ECF.

The application is X granted
 denied



Edgardo Ramos, U.S.D.J.
Dated: 3/4/2021
New York, New York